

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI  
GREENVILLE DIVISION**

---

**WESLEY REED,  
GREGORY STRONG,  
RICHARD STRONG,  
ANDREW JOHNSON,  
STACY GRIFFIN and  
JAMES SIMPSON,**

**Plaintiffs,**

**v.**

**PITTS FARMS PARTNERSHIP,**

**Defendant.**

---

**CIVIL ACTION**

**No. 4:21-cv-00113-DMB-DAS**

**STIPULATION OF CONSENT TO AMENDMENT OF COMPLAINT**

Pursuant to Federal Rules of Civil Procedure Rule 15(a)(2), Plaintiffs and Defendant hereby stipulate and notify the Court that Defendant consents to Plaintiffs amending their Complaint, Dkt. No. 1.

Respectfully submitted,

**/s/ Melia Amal Bouhabib**

Melia Amal Bouhabib, TN Bar No. 035588

*Admitted pro hac vice*

SOUTHERN MIGRANT LEGAL SERVICES

A Project of Texas/RioGrande Legal Aid, Inc.

311 Plus Park Blvd., Ste 135

Nashville, TN 37217

Tel.: (615) 538-0725

Fax: (615) 366-3349

abouhabib@trla.org

**/s/ Robert McDuff**

Robert McDuff, MS Bar No. 2532  
MISSISSIPPI CENTER FOR JUSTICE  
767 North Congress Street  
Jackson, MS 39202  
Tel.: (601) 259-8484  
Fax: (601) 352-4769  
rbm@mcdufflaw.com

Reilly Morse, MS Bar No. 3505  
MISSISSIPPI CENTER FOR JUSTICE  
764 Water Street  
Biloxi, MS 39533  
Tel.: (228) 702-9987  
Fax: (228) 435-7285  
rmorse@mscenterforjustice.org

Gregory S. Schell  
Florida Bar No. 287199  
*Admitted Pro Hac Vice*  
SOUTHERN MIGRANT LEGAL SERVICES  
A Project of Texas/RioGrande Legal Aid, Inc.  
311 Plus Park Blvd, Ste 135  
Nashville, TN 37217  
Tel: (615) 538-0725  
Fax: (615) 366-3349  
gschell@trla.org

ATTORNEYS FOR PLAINTIFFS

**/s/ Timothy M. Threadgill**

Timothy M. Threadgill  
Sammy L. Brown, Jr.  
BUTLER SNOW LLP  
1020 Highland Colony Parkway, Suite 1400  
Ridgeland, Mississippi 39158-6010  
Tel: (601) 948-5711  
Fax: (601) 985-4500  
tim.threadgill@butlersnow.com  
[sammy.brown@butlersnow.com](mailto:sammy.brown@butlersnow.com)

ATTORNEYS FOR DEFENDANT